

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INVENTOR HOLDINGS, LLC,

Plaintiff,

v.

**KMART CORPORATION, SEARS,
ROEBUCK & COMPANY and SEARS
HOLDINGS MANAGEMENT
CORPORATION,**

Defendants.

INVENTOR HOLDINGS, LLC,

Plaintiff,

v.

BED BATH & BEYOND INC.,

Defendant.

CASE NO. 1:14-cv-185 GMS

(CONSOLIDATED)

CASE NO. 1:14-cv-448-GMS

DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to D. Del. LR 7.1.2, Defendants Kmart Corporation, Sears, Roebuck & Company, Sears Holdings Management Corporation, and Bed Bath & Beyond Inc. (collectively, "Defendants") hereby move for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c) and request this Court dismiss Plaintiff Inventor Holdings LLC's Complaint for failure to state a claim upon which relief can be granted.

The grounds for this motion are further set forth in the Defendants' Opening Brief in Support of their Motion for Judgment on the Pleadings, which is being filed contemporaneously herewith.

Dated: February 6, 2015

Respectfully submitted,

By:

/s/ Jeremy D. Anderson

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**[PROPOSED] ORDER GRANTING DEFENDANTS'
MOTION FOR JUDGMENT ON THE PLEADINGS**

Having considered Defendants Kmart Corporation, Sears, Roebuck & Company, Sears Holdings Management Corporation, and Bed Bath & Beyond Inc.'s (collectively, "Defendants") Motion for Judgment on the Pleadings,

IT IS HEREBY ORDERED this _____ day of _____, 2015, that the Motion is GRANTED.

Honorable Gregory M. Sleet